

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
ST. LOUIS DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
vs.) Case No.: 4:11-cr-25 JCH
)
JAGADISH D. PATEL,)
)
 Defendant.)

FIRST MOTION FOR EARLY TERMINATION OF PROBATION

COMES NOW Defendant, Jagadish Patel, by and through counsel, and hereby moves this Court to terminate early the two-year probationary sentence imposed on June 15, 2010. In support of this motion, Defendant states as follows:

1. On February 24, 2010, Defendant pled guilty in the Western District of Missouri to a single violation of 18 U.S.C. § 1001. See United States v. Jagadish D. Patel, 4:09-cr-219 FJG [Doc. Text #17].

2. On June 15, 2010, the Honorable Fernando J. Gaitan, Jr., placed Defendant on probation for a period of two years. See id. at [Doc. Text #22].

3. On February 15, 2011, the Western District of Missouri transferred Jurisdiction of Defendant's case to this district, see [Doc Text #24], which acknowledged the transfer in a letter mailed to the Western District on March 8, 2011. [Doc. Text #25]

4. Defendant has complied with all conditions of probation since June 15, 2010 and has incurred no violations whatsoever.

5. Defendant works full-time and has no prior convictions or arrests.

6. Defendant is a husband and father, whose family is intact, productive, and free of criminality.

7. Defendant, through counsel has discussed this matter with assistant United States attorney William Meiners in the Western District of Missouri. Mr. Meiners does not object to Defendant's request

8. Defendant, through counsel, has also discussed this matter with assistant United States attorney Antoinette Decker. Ms. Decker has confirmed Mr. Meiners' position and does not object to Defendant's request either.

9. Finally, Defendant, through counsel, has discussed this matter with United States Probation Officer Lisa Haar. Ms. Haar has no objection to Defendant's request.

WHEREFORE, Defendant respectfully requests this Honorable Court terminate early the two-year probationary sentence imposed on June 15, 2010

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Adam D. Fein
ADAM D. FEIN, #52255 MO
Attorney for Defendant
120 S. Central Avenue, Suite 130
Clayton, Missouri 63105
(314) 862-4332/Facsimile (314)862-8050

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2011, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the United States Attorney's Office for the Eastern District of Missouri.

